EXHIBIT A

Summons and Complaint

Circuit Court For Prince George's County
Clerk Of The Circuit Court
Courthouse
Upper Marlboro, Md. 20772-9987
MD Relay Service Voice/ TDD
1-800-735-2258

Writ of Summons Case ID: CAL15-16402

State of Maryland, Prince George's County to wit:

To: Shoppers Food Warehouse Corporation
Sv: Corporation Trust Inc.
351 West Camden Street
Baltimore, MD 212012201

You are hereby summoned to file a written response by pleading or motion in this court to the attached complaint filed by:
ELAINE B JONES
4547 EADS STREET, NE
WASHINGTON DC 20019

Within 30 days after service of this summons upon you.

WITNESS: the Honorable Clerk of the Circuit Court for Prince George's County, Maryland.

Date issued: June 22, 2015

Sydney J. Harrison
Clerk

To the person summoned:

1. Personal attendance in court on the day named is not required.
2. Failure to file a response within the time allowed may result in a judgment by default or the granting of the relief sought against you.
3. Proper Courtroom attire is expected. Anything that you would wear to an office that presents a professional appearance is appropriate. Please no shorts, cut-off jeans, halter, tank or tube tops or other attire that reveals the abdomen or lower back, spandex or mesh garments.

Sheriff's Return

Fee $__________ Sheriff ____________________

Note:

1. This summons is effective for service only if served within 60 days after the date it is issued.
2. Proof of service shall set out the name of the person served, date and the particular place and manner of service. If service is not made, please state the reasons.
3. Return of served or unserved process shall be made promptly and in accordance with Rule 2-126. If this summons is served by private process, the process server shall file a separate affidavit as requiredby Rule 2-126 (a).
4. Direct your responses and questions to Circuit Court for Prince George's County, Clerk of the Circuit Court, 14735 Main Street, Courthouse D1002, Upper Marlboro, MD 20772-9987. Legal advice cannot be obtained from this office.

FILED ENTERED
LOGGED RECEIVED
JUL 17 2015
AT GREENBELT
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY DEPUTY

IN THE DISTRICT COURT FOR PRINCE GEORGES COUNTY, MARYLAND

ELAINE B. JONES
4547 Eads Street, NE
Washington, DC 20019

Plaintiff,

v.

and

SHOPPERS FOOD WAREHOUSE, CORP.
11840 Valley View Road
Eden Prairie, MN 55344

SERVE: The Corporation Trust, Inc.
351 West Camden Street
Baltimore, MD 21201

Defendant.

Civil No.: CAL15-16402

Clerk of the Circuit Court
2015 JUN -8 PM 4:04
PR GEO CO MD #84

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COMPLAINT

COMES NOW the Plaintiff, Elaine B. Jones, by and through her undersigned attorneys, Jonathan S. Beiser and Ashcraft & Gerel, LLP, and by way of her Complaint against the Defendant, Shoppers Food Warehouse, Corp. (hereinafter "Shoppers Food Warehouse"), states as follows:

PARTIES

1. Plaintiff Elaine B. Jones is a natural person residing at 4547 Eads Street, NE, Washington, DC 20019.

2. Defendant Shoppers Food Warehouse is a company having its principal place of business at 11840 Valley View Road, Eden Prairie, MN 55344. Defendant Shoppers Food Warehouse is the owner, operator and/or manager of the Shoppers Food Warehouse store located

at 4807 Marlboro Pike, Capitol Heights, MD 20743.

FACTS COMMON TO ALL COUNTS

3. The Plaintiff, Elaine B. Jones, incorporates by reference the allegations of paragraphs 1 and 2 herein.

4. On or about June 11, 2012, the Plaintiff, Elaine B. Jones, was a patron at the Shoppers Food Warehouse store, which is owned, operated and/or managed by Defendant Shoppers Food Warehouse, located at 4807 Marlboro Pike, Capitol Heights, MD 20743.

5. The Plaintiff, Elaine B. Jones, while exercising due care and without any contributory negligence of her own, slipped and fell on a "wet floor" sign that was lying flat on the floor.

COUNT I
(Negligence)

6. The Plaintiff, Elaine B. Jones, incorporates by reference allegations of paragraphs 1 through 5 herein.

7. Defendant Shoppers Food Warehouse owned, operated, controlled, leased and/or held itself out as owner of the Shoppers Food Warehouse store where the Plaintiff, Elaine B. Jones, was a patron at the time of the incident on the aforementioned date.

8. Defendant Shoppers Food Warehouse had a number of duties it owed to the Plaintiff, Elaine B. Jones, including, but not limited to a duty to (a) provide appropriate treatment to prevent and refrain from creating hazardous conditions, (b) inspect the premises to discover any unreasonably dangerous conditions which they knew or had reason to know existed and to which their business invitees would be exposed, (c) post warnings about any unsafe or

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unreasonably dangerous conditions in such a way as to ensure that the persons intended to be protected by those warnings would, in fact, be able to see the same and appropriately adjust their conduct, and (d) to otherwise ensure that the premises were maintained in a reasonably safe condition such that no unreasonable threat of harm would be posed to invitees, customers, visitors or others on the premises.

9. Defendant Shoppers Food Warehouse had a duty to perform the necessary treatment, inspections, evaluations, warnings and remediation, to prevent, discover and avoid the dangers which were likely to be or had been created or existed and to take any and all other measures to ensure safe premises for those persons who would be lawfully walking thereon.

10. Defendant Shoppers Food Warehouse breached the aforementioned duties.

11. As a direct and proximate result of Defendant Shoppers Food Warehouse's negligence, the Plaintiff, Elaine B. Jones, suffered severe bodily injuries, which caused her and will continue to cause her severe physical pain, emotional distress and permanent disability, impairment and disfigurement.

12. As a further direct and proximate result of Defendant Shoppers Food Warehouse's negligence, the Plaintiff, Elaine B. Jones, has incurred and will continue to incur in the future, substantial sums of money for medical care, attention and other expenses.

13. As a further direct and proximate result of Defendant Shoppers Food Warehouse's negligence, the Plaintiff, Elaine B. Jones has sustained and will continue to sustain a loss of wages and earning capacity.

14. Plaintiff has complied with all conditions precedent to the maintaining of this claim and lawsuit.

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WHEREFORE, the Plaintiff, Elaine B. Jones, prays for judgment against the Defendant, Shoppers Food Warehouse, in an amount in excess of Seventy-Five Thousand Dollars, together with interest and the cost of the suit filed herein.

Respectfully submitted,

ASHCRAFT & GEREL, LLP

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IN THE DISTRICT COURT FOR PRINCE GEORGES COUNTY, MARYLAND

ELAINE B. JONES	:	
Plaintiff,	:	
v.	:	**Civil No.:**____________
and	:	
SHOPPERS FOOD WAREHOUSE, CORP.	:	
Defendant.	:	

DEMAND FOR JURY TRIAL

Plaintiff hereby requests a trial by jury on all issues in the above-captioned matter.

Respectfully submitted,

ASHCRAFT & GEREL, LLP

____
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